GWCT supplementary information to the Consultation on amending Schedule 2.1 of the WCA 1981.

In our consultation responses, the Game & Wildlife Conservation Trust (GWCT) has sought to answer the specific questions posed by Defra, Scottish Government and Welsh Government. This supporting document provides Defra, Scottish and Welsh Governments and their Statutory Nature Conservation Bodies with additional information that we hope will result in an effective and appropriate policy decision. We do not believe basing decisions on a precautionary approach will lead to desired outcomes; in fact, we believe it may well result in unintended consequences. Instead, we propose a package of measures based around adaptive harvest management and self-regulation.

1. Introduction

The GWCT welcomes the opportunity to respond to this consultation.

We are a leading UK charity conducting conservation science to enhance the British countryside for public benefit. For over 90 years we have been researching and developing game and wildlife management techniques. We use our research to provide training and advice on how best to improve the biodiversity of the countryside. We advise farmers and landowners on improving wildlife habitats. We employ c.60 research staff, including c.15 post-doctoral scientists, with expertise in areas such as birds, insects, mammals, farming, fish and statistics. We undertake our own research as well as projects funded by contract and grant-aid from Government and private bodies.

2. Background and GWCT credentials

The conservation world is collectively trying to tackle the twin crises of biodiversity loss and climate change. The GWCT has an important role to play because of the way in which we work with farmers, river keepers, gamekeepers, moorland managers, and others in England, Scotland and Wales. By helping them work collaboratively at significant scale and putting our science into practice, the GWCT has a big impact. In a nutshell, our aim is to achieve landscape-scale nature recovery to the point of resilience.

The issues around biodiversity loss and climate change place increasing urgency on the production of information and evidence (both scientific and experiential) which can be used to form decisions and trial initiatives. This affects all stakeholders, from government to individuals. The GWCT recognises that this an extremely important concern. It has significantly influenced our strategic thinking, and this is now embedded in our key goals of:

1. An evolving research programme
2: Expanding our use of practitioner evidence
3: Using land manager collaboration to deliver biodiversity recovery at scale
4. Boosting our education and engagement programme

We continue to focus research on species recovery, long-term population resilience, and routes to net environmental gain at landscape-scale, also exploring opportunities for collaboration with international partners.

Our Research team has embraced new technologies, from GPS tracking and drones to DNA analysis, employing AI to speed up data processing, and novel statistical analysis to inform management.

We see a continued need to invest in our data support team to ensure timely scientific outputs, increase data collection by practitioners, and to facilitate modelling of likely outcomes of policy options and land management scenarios.

The GWCT is launching an expanded Practitioner Evidence Programme to deliver cost-effective farmland and moorland monitoring that farmers and gamekeepers can use to evidence biodiversity gains, support licence applications, and track species recovery.

We will extract new knowledge from long-term datasets which go back to the 1960s whilst continuing to collect data and build the legacy of these projects.

Almost every piece of our science over the years has made use of these datasets, but now their decades of data make them intrinsically valuable in their own right.

All of these features are applicable to the consultation on amending the Wildlife and Countryside Act 1981 Schedule 2.1 'quarry species' list, and how we work collaboratively to secure the best solutions for species management and conservation. The GWCT's National Gamebag Census (NGC) and increasing its usage is of particular relevance, value and importance to this quest.

3. NGC and other data collection methods

The NGC was established by the GWCT in 1961 to provide a central repository of records from shooting estates in England, Wales, Scotland and Northern Ireland. The records comprise information from shooting and gamekeeping activities on the numbers of each quarry species shot annually ('bag data').

Through the inclusion of data from historical game books, records for several species extend back to the early 20th century and for a few game species to the early 19th century. Data on predatory birds and mammals allowed by law to be controlled have also been collected systematically since 1961. The scheme is voluntary, and we are extremely grateful to all the owners and keepers who send in their returns at the end of each season.

The long runs of well-documented data on huntable and predatory bird and mammal species, make bag returns an important source of information on the changes in numbers killed and, by inference, on population densities. They also provide a unique historical perspective on changes in shooting itself.

Because a substantial proportion of the countryside is managed for shooting, the NGC data potentially reflect trends in national and regional abundance for a wide range of species, many of which are only partially monitored by government schemes. It is, however, important to realise that bag data depend on effort as well as on abundance, so the interpretation of trends is not necessarily straightforward.

Nevertheless, an important feature of the NGC is that:

"the relationship between bag indices and changes in population size can be used to evaluate the importance of shooting as a potential influence on populations. If, for instance, bag and population sizes

decline or increase at a similar rate, it suggests that bags are tracking population size rather than influencing it. If population size increases faster than bag size, or bag size decreases faster than population size, it suggests that shooting mortality is not causing population change, and vice versa."[1]

We also recognise that the NGC covers mainly inland shooting on farms, moors and estates, so it is not specifically used by individual hunters or coastal wildfowlers who do not participate in the NGC. However, this constituency is far better represented by BASC, through its provisions for data collection, facilitating practical conservation[2] and the Sustainable Shooting Code of Practice[3]. The NGC focus does however have additional relevance in terms of capturing broad habitat initiatives and predation management. These add vital dimensions to understanding the relationship between shooting activity and conservation effort.

Thus, there are mechanisms that enable the flow of key information to enable critical insight into bag returns and scope for use in conservation management. Further, the key organisations involved in research, shooting and conservation publish specific advice to their memberships regarding self-regulatory recommendations. We can demonstrate positive behaviours in response to these recommendations.

4. Research, advisory recommendations and behavioural responses

The GWCT maintains a highly respected body of research on species including Grey Partridge, Black Grouse, Snipe and Woodcock. Indeed, the Grey Partridge remains the Trust's emblem, based on many decades of research interpreting the effects of intensive farming through the Sussex study[4] (the longest-running monitoring project in the world measuring the impact of changes in farming on the fauna and flora of arable land), the Partridge Count Scheme[5] (in the first group of species to be given priority under the government's 1995 Biodiversity Action Plan), and Grey Partridge conservation guidance[6].

Black Grouse research has been an important component of GWCT's work over many years, including the current Range Expansion Project[7]. Snipe research is also current, tracking their migration routes to breeding grounds[8]. Both projects have attracted media coverage in the last year. The GWCT and British Trust for Ornithology (BTO) have conducted a Woodcock survey every decade since 2003, with the most recent survey in 2023[9]. This survey aims to monitor the breeding population of the Eurasian Woodcock in the UK and Ireland, and provides a major contribution to understanding of population change, and potential influences:

"Continued monitoring will capture the woodcock population's response to ongoing environmental and land-use change, such as the marked increase in tree-planting, which may benefit resident woodcock."

All these surveys, projects and initiatives support self-regulatory behavioural responses, resulting from communication of our research via regular briefings, annual reports, guidance documents and advisory support to land managers. Leading examples include the voluntary moratorium on shooting of Black Grouse, which has been in place for many years, and recommendations contained in

[1] NGC Newsletter, issue 22, January 2024
[2] https://basc.org.uk/wildfowling/advice/bag-recording-for-wildfowlers/
[3] https://basc.org.uk/wildfowling/advice/sustainable-shooting-code-of-practice/
[4] https://www.gwct.org.uk/research/long-term-monitoring/sussex-study/
[5] https://www.gwct.org.uk/advisory/guides/conserving-the-grey-partridge/conservation-targets-partridge-count-scheme/
[6] https://www.gwct.org.uk/media/208610/Conserving-the-Grey-Partridge.pdf
[7] https://www.gwct.org.uk/research/species/birds/black-grouse/range-expansion-project/#project
[8] https://www.gwct.org.uk/news/news/2025/november/new-project-to-track-common-snipes-migration-routes/
[9] https://www.gwct.org.uk/game/research/species/woodcock/breeding-woodcock-survey/

'Conserving our Woodcock: Research-based measures to help the UK's resident population' [10]. Published in 2022, these encourage:

1. Avoiding shooting woodcock early in the season – recommends not shooting before 1st December
2. Improving understanding of local woodcock populations before shooting
3. Showing restraint even where resident birds are absent
4. Shooting flight lines with caution
5. A curb on shooting during freezing weather.

The 2023 GWCT/BTO British Woodcock Survey demonstrated that:

- the woodcock population has declined further mainly due to significant losses in northern Scotland. Northern England experienced population growth whilst populations in southern Scotland, England, and Northern Ireland remained relatively stable
- the number of woodcock shot has declined since the late 2000s, mainly in England and Wales, while hunting levels in Scotland have remained stable.

Despite the strong body of research and advice, it is nevertheless important to establish how this is translated into behavioural response. We point to two strands of evidence: 1) a 2026 membership survey, and 2) GWCT advisory team feedback

Membership survey – Snipe and Woodcock

To assess our members' shooting and conservation behaviours, as well as their views on Schedule 2.1 consultation proposals, GWCT conducted a survey to track current attitudes and practices regarding two of the principal species for which we undertake particular research (Urgent questionnaire on the future of woodcock and snipe shooting in Great Britain - Game and Wildlife Conservation Trust). In the short time we offered this survey (9 days) we had over 400 responses across all three nations demonstrating the commitment that our members have to species conservation and sustainable harvesting. GWCT's membership is more typically aligned with organised farm or estate shoots, rather than individual hunters supported by the BASC. The headline results are set out below:

Woodcock

- 89% of survey respondents (n = 408) indicated that they do not shoot woodcock before 15th November in Scotland, or before 1st December in England and Wales
- 53.2% of respondents (n = 381) say they have reduced the bag size since 2018
- 36% (n = 148) felt there should be self-regulatory adherence to these dates, whilst 29.4% (n = 121) felt the season should remain the same with timing of shoots left shoot captain discretion

Snipe

- 92% of survey respondents (n = 352) indicated that they did not shoot snipe before 30th September
- 32.4% of respondents (n = 114) also indicated that they had reduced bag size

[10] Brewin, J., Hoodless, A. N., Heward, C.J. and Hopgood, A. 2022 'Conserving our Woodcock: Research-based measures to help the UK's resident population. Game & Wildlife Conservation Trust

- 34% (n = 138) supported a self-regulatory approach to recommended start dates for shooting, whilst 32% (n = 130) preferred the shoot season to remain the same, with timing of shoots left to shoot captain discretion

Habitat management

- 49.8% of respondents (n = 138) indicated that they had undertaken habitat management for both species, predominantly for woodcock, in the last 10 years
- 72% (n = 239) believe that their management benefits wintering or breeding birds

Migratory ducks and waders

- 30.3% (n = 110) felt conservation efforts for migratory ducks and waders would cease if a species was removed from Schedule 2.1, indicating impacts on habitat retention, habitat management and predator management
- 56.9% of respondents (n = 201) prefer an adaptive harvest management system, with reliance on species counts and variable bag limits for migratory ducks and waders

The consultation seeks responses from England, Wales and Scotland. Our survey results indicate the following from each of these nations:

Overall Pattern (Respondents from England)
Across this set, the key themes are:

- Habitat management is viewed as the dominant influence on populations, more so than shooting
- Self-regulation and low shooting intensity are widely described as established norms
- Many respondents report stable or locally strong populations, though variability is acknowledged
- Shooting is often framed as supporting conservation through incentivising land management
- There is resistance to blanket legislative change, with preference for local, flexible approaches
- Views remain mixed on the ethics of shooting, but overall emphasis is on sustainability and restraint.

Overall Pattern (Respondents from Wales)
Across this set, the dominant narrative is:

- Self-regulation, sustainability, and low shooting intensity are widely embedded
- Habitat management and predator management are viewed as the key drivers of population trends
- Many perceive populations as stable or locally strong, with variability by region
- There is scepticism about existing data and evidence used in policy decisions
- Strong resistance exists to blanket legislation, with preference for local, evidence-based approaches.

Overall Pattern (Respondents from Scotland)
Across the responses, the dominant position is:

- Self-regulation + restraint + local decision-making are viewed as effective and already widely practiced
- There is limited support for blanket bans, but some support for targeted restrictions

- Concerns are focused more on commercial shooting practices than on shooting in general
- Habitat management and environmental factors are seen as equally or more important than regulation in influencing populations.

GWCT advisory team insights

The survey data also align with a recent review of GWCT advisory team shoot biodiversity assessment site visits, which provide a broad look at the biodiversity implications of how a shoot is run. These assessments include specific questions about woodcock policy. Out of eighteen reports since 2018, nine say that the shoot follows GWCT guidelines, four say no woodcock are shot, and one had no rule. The remaining four have a 'no woodcock' on sold shoot days policy but may occasionally allow them on a very limited number of private family shoot days[11]. This trend is also reported by McNicol, Ellis and Madden (2024)[12]:

"Qualitative data suggests that over 90% of hunters now report shooting woodcock only after the recommended date of 1st December, or not at all. This is reflected in bag data which shows that, since 2018, fewer than 3%-13% of woodcock shot were harvested prior to 1st December. Around a third of hunters have reported stopping shooting woodcock and it is likely the harvest will decline in coming years due to voluntary restraint. This work demonstrates both through self-reported data and independent harvest data that behaviour change amongst hunters can be effected."

Overview of behavioural responses and advisory insights

A strong emphasis on self-regulation, restraint and local decision-making is expressed by the membership, which is also identified through GWCT advisory work. Habitat management and predator management feature as important components of conservation support for quarry species, which is viewed as more influential for species populations than the shooting take. Sustainability is an important sub-text. It is therefore no surprise that there is only limited support for blanket restrictions proposed by the Schedule 2.1 consultation.

Mind the gap

However, it is clear is that despite these strong behavioural responses, this does not necessarily translate into regular, consistent recording to demonstrate evidence of good practice. The DEFRA Schedule 2.1 consultation points to insufficient evidence for species decision-making. Despite their obvious significance to species and conservation management, the NGC, Patridge Count Scheme and other data collection approaches run by the GWCT are voluntary, as are the schemes run by BASC. Far more information returns from across the hunting community and land managers would materially assist conservation guidance and practical decision-making by all stakeholders. In the absence of sufficient information, the shortfall in species data therefore exposes the risk of precautionary restrictions.

This evidence gap may be occurring because:

- A 5-year review cycle for Schedule 2.1 species under the Wildlife & Countryside Act is inadequate in view of the growing recognition of climate change, biodiversity and land use change impacts on species. It does not incentivise the urgency for regular assessment
- The change of Government in 2024 impacted on consistent engagement between DEFRA and stakeholder organisations that might have advanced progress on information gathering initiatives

[11] Swan, M., pers comments, 'Self-Regulation and Woodcock Shooting', 2026

[12] Cat M. NcNicol, Matt B. Ellis, Joah R. Madden, 2024 'Evaluation of self-regulation by the hunting community: a case study on the voluntary restraint of woodcock hunting in the UK'

- Contemporary data recording options could now be deployed, for instance through mobile app and other technologies. Emerging bio-acoustic monitoring and E-DNA sampling could provide researchers with alternative techniques
- There may be ongoing fears amongst hunters regarding the confidentiality of data submissions and how these might be used by Government and Agencies. All stakeholders will need to work on building confidence in data gathering and usage frameworks
- Hunters and Land Managers could therefore make up the information shortfall with better understanding as to this need. GWCT and other organisations can assist them to explain the concerns and increase bag returns.

5. Does adoption of the Precautionary Principle provide a practical response?

Whatever the reasons for the gap in evidence, defaulting to a Precautionary Approach mentioned in the Schedule 2.1 consultation documents is of real concern to GWCT. We question whether it is appropriate or even advisable to base a policy decision in the absence of sufficient data on shooting bags to interpret whether shooting is having an impact. Whilst curbing shooting activity may provide a popular and immediate policy fix for government, it does not necessarily aid species conservation given that the socio-economic motivation for much privately-funded conservation management work and habitat provision/restoration/creation is the ability to harvest a few wild game. In addition, land managers with an interest in these species are valuable sources of information on their abundance, habitat preferences, migration timings etc through contributing to member surveys such as the NGC, our woodcock and snipe migration research, the Big Farmland Bird Count and our Partridge Count Scheme.

Focussing purely on curbing shooting activity through applying the precautionary approach avoids addressing and generating a wider understanding of all the influences on species population dynamics such as changes in habitat condition, land use, climate change and predator management alongside the shooting take. This is especially significant because in some cases, the species reviews mention the low risk that hunting bags are having on species abundance:

"…no evidence of hunting impacts at wider scale, but BirdLife International/IUCN has proposed that 'monitoring and research should be introduced to determine the impact of hunting on this species" (Goldeneye)

"Further research into the links between known bag returns and the temporal pattern of shooting, with subsequent feather stable-isotope analysis of resident/migrant birds, would improve understanding of the effects of shooting on the resident population and assist with future decision-making concerned with managing/mitigating any impacts of shooting on the species." (Snipe)

More broadly we question whether its application is appropriate given the emergent regulatory environment heralded by the Corry Review[13] and the desire to shift away from excessive risk aversion within the regulatory system – *"[An] extremely precautionary approach limits [Defra's regulators] discretion to make choices about how the regulation is applied in a way that still delivers protection but balances that against wider objectives such as job creation, sustainable growth and nature enhancement*". This new approach is further embedded in Natural England's (NE) Strategic Policy Statement (Strategic Policy Statement for Natural England - GOV.UK) which states that in support

[13] https://www.gov.uk/government/publications/delivering-economic-growth-and-nature-recovery-an-independent-review-of-defras-regulatory-landscape

of nature's recovery NE should prioritise earned autonomy so trusted partners can restore nature more efficiently. Working with rather than against the game management and shooting community in the conservation of woodcock and snipe would be an excellent example of this new approach in action.

Fostering a balanced approach might also encourage improved insight amongst administrators, helping to avoid the unfortunate assumption made in the consultation concerning the questions relating to the numbers sold and value of carcasses for geese. It is illegal to sell a dead wild goose. For hunters, the value of the sport is not about the economics; it is fundamentally about participation and an appreciation for nature that is recognisable through the strong parallel commitment to conservation.

Precautionary restrictions and protection can have the effect of disincentivising hunters and land managers from both species bag recording and wider conservation work. Prior to the full protection of mountain hares in 2021, GWCT had supported 60 estates across Scotland to count mountain hares in line with NatureScot-approved methodology (commissioned report 1022). 104 individuals had been trained, 82 tetrads established and 248 transects mapped. In the year following protection, the number of participating estates had collapsed to less than10. We have therefore almost completely lost an extremely valuable source of evidence that would inform conservation status and support. Whilst this might be seen as an extreme example, it illustrates what is potentially at stake with restrictions or bans for species under review in the Schedule 2.1 consultation ***before*** stakeholders consider optimal evidence gathering and adaptive solutions.

The 5-year review process for Schedule 2.1 species up until now suggests the likelihood that once enacted, seasonal changes and bans will be extremely difficult to adjust or repeal, because of the administrative bureaucracy. These will not serve conservation well. We need flexibility to respond to emerging evidence. This is not just essential for understanding whether currently listed species are affected by the shooting take, climate change, weather patterns or habitat and land use changes. It is also important to provide the flexibility to add birds not currently on Schedule 2.1, whose populations are growing, impacting on habitat condition and other species. In this respect, we acknowledge the practical approach regarding the proposal to add wood pigeon to Schedule 2.1, provide for a close season and maintain a safety valve through the maintenance of General Licence provisions. This provides a working model for the management and conservation of other species.

We recognise that against the backdrop of climate change, land use change and biodiversity impacts, there is a pressing need to encourage greater take-up and participation so that we can fill in evidence gaps, particularly for species that are the subject of the consultation review. The GWCT favours immediate dialogue to work up an Adaptive Harvest Management framework before consideration of restrictions.

6. Adaptive Harvest Management (AHM)

We support the proposals for AHM advanced by NatureScot (NS) in their document linked to the consultation. We acknowledge that the application of their approach needs consideration in relation to the individual recommendations made by DEFRA and NRW for England and Wales, but this should not deflect from the broad principles. The essence of the NS approach is set out thus:

"We do not have evidence to show that there are any bird species in Scotland where the pressure from hunting is material in the population declines; there is a paucity of information both in terms of bag returns and changes to hunting effort. For our recommendations to deliver the desired outcome and indeed have the

possibility of enhancing populations of these listed species, there needs to be a change to bag-record keeping and a coordinated plan prepared by the hunting sector, to make this work.

The development of a co-designed plan and its effective management and delivery, is something that our Shared Approach should be able to guide."

They also comment that this recommendation requires the co-operation of the hunting sector and commitment to an adaptive harvest model. We previously discussed this with NS between late 2022 and early 2023, before a pause in dialogue in the run-up to publication of the consultation. We will be pleased to reconvene this process with NS because we recognise the potential to move forward with the Shared Approach they allude to. This has been supported by the Scottish Wildlife Managers Forum convened by the Minister for Agriculture up to the May 2026 Scottish Parliamentary Election. NS comment on the previous dialogue and the potential use of app-based technology for data collection. The GWCT has further progressed mobile data collection to assist the gathering of best practice since the last exchanges on Schedule 2.1.

NS recommend this procedure is put in motion through the Shared Approach and that a clear timescale adopted. We agree because this squares with GWCT's drive for evidence-led approaches to conservation. NS comment on the necessity for discussion around data collection and ownership, and the resourcing and support they could apply. We regard this as essential so that shared access, data protection, sufficient resources to deliver the AHM framework and collaborative interpretation of data are clearly established and agreed for successful delivery.

We believe that the AHM approach recommended by NS should also be considered by DEFRA and NRW so that there is a consistent approach across the three countries, allowing for the efficient co-ordination of stakeholder resources. We note the suggestion made by BASC that this might be achieved and overseen through the oversight of the Joint Nature Conservation Committee (JNCC).

7. An alternative way forward – self regulation and adaptive harvest management informed by data collection

The GWCT did not feel that the consultation considered the evidence around the voluntary approach and whether it could be improved or reflected across other species in England. This is disappointing given that the success of the voluntary moratorium on shooting Black Grouse in Scotland is acknowledged by the Scottish Government and is the basis for their proposed voluntary moratoriums on ptarmigan and grey partridge. The success of this approach in Scotland is recognised as being due to the 'buy-in' from land managers – and it is this very motivation that has also been used to change woodcock shooting habits in England. Indeed in England reversing the national decline of other quarry species, such as black grouse, has been achieved by working with shoots to maintain good habitat and protection from generalist predators alongside voluntary restraint.

In respect of Scotland, whilst we recognise the success of the moratorium for Black Grouse, we propose that the framework for an Adaptive Harvest Management approach is first established to instil confidence and transparency prior to consideration of restraint regarding Ptarmigan and Grey Partridge shooting. There is already a long and well-observed pattern of self-regulation with regard to Grey Partridge, again based on extensive work and monitoring undertaken by the GWCT across

the UK and in Scotland (Conserving the Grey Partridge[14], the Partridge Count Scheme[15] and the Scottish Grey Partridge project[16]).

The GWCT member survey demonstrated that 89% of survey respondents indicated that they do not shoot woodcock before 15th November in Scotland, or before 1st December in England and Wales. Often the reason given was that decisions could be based on local bird numbers and conditions rather than a blanket approach across each nation. The headline results also demonstrate that habitat management and predator control feature as important components of conservation support for quarry species, which is viewed as more influential for species populations than the shooting take. It is also important to recognise that this management of wetland environments supports many other species of conservation concern. Headline species would include lapwing, curlew and redshank.

Consequently, the membership survey results show a strong commitment to self-regulation, restraint and local decision-making. Whilst we accept (and some respondents noted) that there is inconsistent compliance across the shooting community, the value of peer pressure and organisational promotion (such as through ourselves and other organisations like BASC) to adopt best practice is a recognised 'tool' in improving behaviour within sectors. We therefore call on government to consider reinforcement of self-regulatory models through promoting:

- the BASC sustainable shooting code of practice which is widely adopted/endorsed by wildfowling clubs in their constitutions
- GWCT guidelines in Conserving our Woodcock Conserving our Woodcock - Game and Wildlife Conservation Trust
- The collection of practitioner evidence and data (via NGC, GWCT Epicollect app etc).

The apparent assumption made from the lack of sufficient bag returns seems to be that hunters are not exhibiting sufficient self-regulatory behaviour that could offset proposals to restrict or ban the shooting of certain species. The GWCT recognises that with increasing need to understand the impacts of climate change, habitat condition, land use changes and shooting, we also need to encourage greater commitment to making gamebag returns so we can demonstrate 'best practice with proof'. However, that doesn't mean that there is a lack of self-regulation.

In fact the GWCT is looking to further develop land manager/practitioner evidence, as an important adjunct to citizen science, through the National Gamebag Census (NGC) and other recording facilities (see point 3 above). We recognise that the NGC is not perfect and will benefit from refinements and propose to develop it into a two-tier model to provide basic and more detailed information gathering e.g. seasonal / date info which will add context to whether individuals / farms / estates are concentrating shooting effort over a few days or over entire season. However in its current form it enables the recording of habitat initiatives and predation control, adding vital dimensions to understanding the relationship between shooting activity and conservation effort. The NGC scheme is voluntary, so we are extremely grateful to all the owners and keepers who send in their returns at the end of each season. The information provided we believe will help governments to make informed decisions and avoid introducing disproportionate regulation.

In addition the GWCT is already providing app-based recording for practitioners to record species sightings or evidence of good practice, and we are working on extending practitioner science

[14] Conserving the grey partridge - Game and Wildlife Conservation Trust
[15] Partridge Count Scheme - Game and Wildlife Conservation Trust
[16] Scottish Grey Partridge Project - Game and Wildlife Conservation Trust

recording. This is well established in Scotland and we can use this technology to assist future bag returns.

Self-regulation by the game shooting sector supported by practitioner data collection and experiential evidence allows for the adoption of an adaptive harvest management approach. This allows for guidance on harvesting take to be continually adjusted on the basis of evolving evidence at both a national and local scale. The collection of data would provide the necessary seasonal/cyclical information that is currently lacking. For example SSSI consents for wildfowling in England and Wales are mostly based on five-year average bags which is a poor basis for adaptive harvest management.

GWCT favours immediate dialogue with governments and agencies to work up an Adaptive Harvest Management framework before consideration of restrictions or bans indicated in the consultation (see section 7 above). We recognise that the application of the NS approach needs consideration in relation to the individual recommendations made by DEFRA, NE and NRW for England and Wales, but this should not deflect from the broad principles.

Reference list (relating to GWCT online responses to consultation):

Investment made in conservation by shooting providers and volunteers (Q.7)

- The Value of Shooting 2024 https://www.countryside-alliance.org/hubfs/The-Value-of-Shooting-2024.pdf

White-fronted Goose (Q4A1)

- Elmberg, J., Hessel, R., Fox, A.D. & Dalby, L. (2014) Interpreting seasonal range shifts in migratory birds: a critical assessment of 'short-stopping' and a suggested terminology. J. Ornithology 155: 571–579.
- Kruckenberg H, Moonen S, Kölzsch A, Liljebäck N, Müskens GJDM (2023) Migration routes and stepping stones along the western flyway of lesser white-fronted geese (*Anser erythropus*). Bird Conservation International 33:1–8

Goldeneye (Q4B1)

- Poysa, H., Rask, M. & Nummi, P. (1994) Acidification and ecological interactions at higher trophic levels in small forest lakes: the perch and the common goldeneye. Annales Zoologici Fennici 31: 397-404.
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- Nummi, P., V.-M. Väänänen, M. Rask, K. Nyberg & K. Taskinen (2012) Competitive effects of fish in structurally simple habitats: perch, invertebrates, and goldeneye in small boreal lakes. Aquatic Science 74: 343–350.

Pintail (Q4C3)

- Wiseman, Ed (2017) One Man's Marshes – the birds of Lymington and Keyhaven
- O'Neal, B.J., Stafford, J.D., Larkin, R.P. *et al.* (2018) The effect of weather on the decision to migrate from stopover sites by autumn-migrating ducks. *Mov Ecol* **6**:23

Pochard (Q4D1)

- Phillips, V. E. (1992). Variation in winter wildfowl numbers on gravel pit lakes at Great Linford, Buckinghamshire, 1974–79 and 1984–91, with particular reference to the effects of fish removal. Bird Study, 39(3), 177–185.

Snipe (Q4E1)

- Baines, D. (2024). Ten years on from a predator removal experiment in the English uplands: Changes in numbers of ground-nesting birds and predators. Journal for Nature Conservation, 126788.
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- www.gwct.org.uk/news/news/2026/may/snipe-on-the-move
- www.gwct.org.uk/research/species/birds/lapwing-and-other-waders/snipe-habitat-use-on-moorland/
- Ellis, M.B. & Cameron, T.C. (2022). An initial assessment of the sustainability of waterbird harvest in the United Kingdom. Journal of Applied Ecology, 59, 2839-2848

Woodcock (Q4F1)

- www.gwct.org.uk/game/research/species/woodcock/breeding-woodcock-survey-2003-and-2013/
- Heward, C.J., Hoodless, A.N., Conway, G.J., Fuller, R.J., MacColl, A.D.C., & Aebischer, N.J. (2018). Habitat correlates of Eurasian Woodcock *Scolopax rusticola* abundance in a declining resident population. Journal of Ornithology, 159: 955-965.
- www.gwct.org.uk/game/advice/conserving-our-woodcock/
- www.gwct.org.uk/policy/position-statements/shooting-woodcock/
- Heward et al. (2024) Population and distribution change of Eurasian Woodcocks *Scolopax rusticola* breeding in the UK: results of the 2023 Breeding Woodcock Survey. Bird Study, 71(2), 109-123
- National Gamebag Census, (www.gwct.org.uk/research/long-term-monitoring/national-gamebag-census/

Should any other species be added to Schedule 2.1 (Q6.3)

- www.gwct.org.uk/wildlife/species-of-the-month/2020/brent-goose/

Game & Wildlife Conservation Trust
17th May 2026